

**Declaration of Carl
Spilly in Support of
Google LLC'S
Opposition to
Plaintiffs'
Administrative
Motion for Relief
(Dkt. 672)**

Unredacted Version

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, WILLIAM BYATT,
JEREMY DAVIS, CHRISTOPHER
CASTILLO, and MONIQUE TRUJILLO,
individually and on behalf of themselves and
all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF CARL SPILLY IN
SUPPORT OF GOOGLE LLC’S
OPPOSITION TO PLAINTIFFS’
ADMINISTRATIVE MOTION FOR
RELIEF (DKT. 672)**

Judge: Hon. Susan van Keulen

Trial Date: None Set

1
2 1. I am a member of the bar of the District of Columbia and an associate with Quinn
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendants Google LLC (“Google”) in this
4 action. I make this declaration of my own personal, firsthand knowledge, and if called and sworn
5 as a witness, I could and would testify competently thereto.

6 2. Pursuant to the Court’s April 15, 2022 (Dkt. 542) and June 10, 2022 (Dkt. 605) order,
7 Google re-reviewed all documents on its privilege logs where (i) the document has been designated
8 as privileged in the document’s text, but no attorney is identified on Google’s privilege log; and (ii)
9 emails where an attorney is copied and does not respond. A total of 2,441 documents were re-
10 reviewed pursuant to these orders.

11 3. Pursuant to the Court’s April 15 and June 10 Orders, Google began producing
12 documents that were de-designated upon re-review on April 19, 2022. Google made additional
13 productions on a rolling basis, and completed its re-review and production on July 22, 2022.

14 4. Attached hereto as Exhibit A is a true and correct copy of an excerpt of the transcript
15 of the June 16, 2021 30(b)(6) Deposition of Dr. Glenn Berntson in this action.

16 5. Attached hereto as Exhibit B is a true and correct copy of the text file for a document
17 marked with the Bates number GOOG-BRWN-00157001, which was produced to Plaintiffs on June
18 18, 2021. Exhibit B is highlighted to identify the relevant text.

19 I declare under penalty of perjury of the laws of the United States that the foregoing is true
20 and correct.

21
22 Executed in Washington, D.C., on August 16, 2022.

23
24 DATED: August 16, 2022

25 By /s/Carl Spilly
26 Carl Spilly
27
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